

The Law Office of
BORRELLI & ASSOCIATES, P.L.L.C.

1010 Northern Boulevard, Suite 328
Great Neck, NY 11021
Telephone (516) 248-5550
Fax (516) 248-6027

350 Fifth Avenue, Suite 3601
New York, NY 10118
Telephone (212) 679-5000
Fax (212) 967-3010
www.employmentlawyernewyork.com

January 25, 2013

Filed Via ECF- Sent simultaneously to Defendant

The Honorable A. Kathleen Tomlinson
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Castellanos v. Deli Casagrande Corporation, et al.*
Docket No.: 11-CV-00245 (JFB)(AKT)

Dear Judge Tomlinson:

This office represents Plaintiff in the above referenced matter. Pursuant to your instructions at the damages inquest held on January 24, 2013, the following is the information requested by your honor with respect to Plaintiff's billing records.

(1) Michael J. Borrelli- managing partner, billing at the rate of \$500/hr. Total of 18.2 hours billed, for a total of \$9,100.00

Mr. Borrelli is the founding and managing member of Borrelli & Associates, P.L.L.C, and has been litigating employment law cases for eleven years. Prior to founding B&A, Mr. Borrelli practiced law as an associate at: Davis & Hersh in Hauppauge, New York; Guercio & Guercio in Farmingdale, New York; and as General Labor Counsel for Flushing Manor Geriatric, Inc. ("Flushing Manor"), three nursing home facilities employing approximately 1,000 workers in New York. Since its inception, the Firm has litigated approximately 600 cases in Federal and State court throughout New York State as well as a handful of cases in New Jersey

and Maryland, with the focus on employment law cases, including a large number of wage and hour cases.

(2) Stephen Zannakos- associate, billing at the rate of \$400/hr. Total of 11 hours billed, for a total of \$4,400.

Mr. Zannikos was an associate with Borrelli & Associates, P.L.L.C in 2011. Mr. Zannikos graduated from NYU with a Bachelor's Degree of Science in 2003 and New York Law School in 2008. At the time he worked at the Firm, he was admitted to practice in the State of New York, the United States District Court for the Southern District of New York and United States District Court for the Eastern District of New York. Prior to joining the Firm, Mr. Zannikos was an attorney at Frank & Associates, P.C. for two years, where he prosecuted employment law violations, such as discrimination, failure to pay overtime and whistle blower based retaliation. While at Frank & Associates, P.C., Mr. Zannikos accumulated significant employment law litigation experience by representing clients alleging numerous forms of unlawful employment practices.

(3) Alexander T. Coleman- associate, billing at the rate of \$400/hr. Total of 1.6 hours billed, for a total of \$640

Mr. Coleman has been an associate with Borrelli & Associates since January 2010. He has been practicing law since 2008, including a clerkship with the Honorable Judge Marum Roush of Fairfax County Circuit Court, in Virginia. Commencing in January 2010 he has been an associate with Borrelli & Associates, P.L.L.C., handling a wide array of employment law cases, including a large amount of wage and hour cases.

(4) Michelle Hagler- associate, billing at the rate of \$400/hr. Total of 7 hours billed for a total of \$2,800.00

Michelle Hagler is an associate formerly with B&A. Ms. Hagler obtained her undergraduate degree from Brooklyn College in 2002, *magna cum laude*, and received her Juris Doctor in 2005 from New York Law School. Prior to working at B&A, Ms. Hagler worked as an associate at three firms with her most prominent role at Curt Arnel & Associates, where she held the title of Senior Trial Associate. At that firm, Ms. Hagler handled cases from intake through trial in the areas of personal injury and matrimonial law. While at B&A, Ms. Hagler handled Plaintiff's civil rights matters including those involving discrimination and retaliation as well as cases for plaintiffs in FLSA and New York Labor Law matters.

(5) Andrew Myers- associate, billing at the rate of \$400/hr. Total of 1.8 hours billed, for a total of \$720.00

Andrew Myers was an associate with Borrelli & Associates, P.L.L.C, and was admitted to practice law in March 2011, after receiving his juris doctor from St. John's University School of Law. Mr. Myers worked as an associate with Leahey & Johnson, P.C., a personal injury/insurance defense litigation firm prior to joining Borrelli & Associates.

(6) Jonathan R. Friedman- associate, billing at the rate of \$400/hr. Total of 9.8 hours billed, for a total of \$3,920.00

I have been an associate with Borrelli & Associates for the past six months, handling a wide array of employment discrimination cases, and a large number of individuals and class action wage and hour cases, such as the one involving Plaintiff herein. Prior to that, I was in house counsel for a labor union, UFCW Local 342 for a year and a half, handling union grievances, arbitrations, NLRB litigation, and federal court litigation focusing mainly on withdrawal liability under ERISA.

(7) Ana G. Guevara- paralegal, billing at the rate of \$125/hr. Total of 8.2 hours, for a total of \$1,025.00

Ana Guevara is a bilingual paralegal with B&A who assisted with the paralegal duties associated with this matter. Ms. Guevara has an associate's degree from Nassau Community College, which she earned in 2008, and a paralegal certificate from the same school, which she earned in 2009. She has been a paralegal with the Firm for almost three years.

(8) Jarissa Peralta- paralegal, billing at the rate of \$125/hr. Total of .9 hours, for a total of \$112.50

Jarissa Peralta is a bilingual paralegal with B&A who assisted with some of the paralegal duties associated with this matter. She is currently an undergraduate student at Borough of Manhattan Community College and has been with the Firm, initially as a legal secretary and most recently as a paralegal, for almost two years.

(9) Sandra Davermann, paralegal, billing at the rate of \$125/hr. Total of .8 hours, for total of \$100.00

Sandra Davermann was a paralegal with Borrelli & Associates, who regularly performed duties including legal research, discovery, and trial preparation with Borrelli & Associates, P.L.L.C. Ms. Daverman graduated from Thomas M. Cooley School of Law.

(10) Yamile Z. Prendes- paralegal, billing at the rate of \$125/hr. Total of 7.2 hours, for a total of \$900.

Yamille Z. Prendes is a bilingual paralegal with B&A who assisted with some of the paralegal duties in this matter. Ms. Prendes earned her undergraduate degree from Queens College in 2011. Ms. Prendes began her career at B&A as a legal secretary before being promoted to a paralegal position. She has been with the Firm for over one year.

(11) Rosario v. Bucaro- paralegal, billing at the rate of \$125/hr. Total of 2.7 hours for a total of \$337.50.

Rosario Bucaro is a paralegal with Borrelli & Associates who regularly performs paralegal duties. Mr. Bucaro graduated with honors from Penn State University in 1993, and earned a Certificate of Distinction in Paralegal Studies from Long Island University in 2010.

Should the Court require any additional information, please do not hesitate to contact the undersigned.

Respectfully Submitted,



Jonathan R. Friedman, Esq.